



Vivian Rivera Drohan  
T: (212)710-0004  
[vdrohan@dlkny.com](mailto:vdrohan@dlkny.com)


May 16, 2024

**VIA ECF**

Hon. John P. Cronan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, New York 10007

The request is granted. The conference scheduled for May 22, 2024, and the deadlines for the related submissions are adjourned *sine die*. The parties shall submit a status letter no later than May 30, 2024.

SO ORDERED.  
May 17, 2024  
New York, New York

  
JOHN P. CRONAN  
United States District Judge

Re: *A.B. v. N.Y.C. Dep't of Educ. et al.*, 23-cv-09350-JPC-SDA

Dear Judge Cronan:

We represent Defendants in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act ("IDEA"), 20 U.S.C. §1400, *et seq.*, as well as for this action.

We hereby write jointly with Plaintiff's counsel to respectfully request an adjournment, *sine die*, of the Initial Pretrial Conference ("IPTC") scheduled before Your Honor for May 22, 2024. This is the parties' first request for an adjournment of the IPTC. We note that the parties are in active settlement discussions with the intention of resolving this matter within the next two weeks and do not believe an IPTC is necessary, so as to avoid the utilization of court resources. In addition, pursuant to Your Honor's Order dated April 29, 2024 (ECF No. 13), the parties were to submit a joint letter and proposed Case Management Plan ("CMP") by May 15, 2024. In light of the requested adjournment of the IPTC for settlement purposes, we respectfully request, *nunc pro tunc*, a corresponding extension of time to submit a joint letter and CMP. The parties apologize for the lateness of this request and inconvenience to the Court.

Accordingly, the parties propose that the CMP and IPTC be adjourned *sine die* and propose submission of a status letter or settlement documents no later than May 30, 2024.

Thank you for considering these requests.

Respectfully Submitted,

/s/ Vivian Rivera Drohan  
Vivian Rivera Drohan, Esq.

cc: All counsel on ECF